

## COMPLIANCE REVIEW MEMORANDUM

To: Alan Johnson, Executive Director  
From: James A. Poag, Investigator  
Re: A12-004 – Ethics Training Compliance (City of Belle Glade)

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- **Background**

As of June 1, 2011, all municipalities within Palm Beach County came under the jurisdiction of the Palm Beach County Code of Ethics (the Code). Pursuant to Section 2-446 of the Code, each municipal administrator is required to establish by policy a mandatory training schedule for all employees and elected/appointed officials to provide them with training on their ethical responsibilities as prescribed by the code. The Commission on Ethics is required to develop and deliver training programs and to coordinate and cooperate with the municipalities to ensure effective and meaningful training of elected/appointed officials and employees. For verification, a training acknowledgment form for each full-time employee and elected/appointed official should be maintained by the Human Resources Department for each municipality.

On February 27, 2012, on behalf of the Commission on Ethics (COE), I initiated a compliance review of the City of Belle Glade (the City) for ethics training compliance. In order to complete this task I contacted Ms. Vivian Hunter, Director of Human Resources, to schedule an on-site visit to review the training files. I conducted an on-site compliance review of the Code of Ethics training acknowledgement forms on March 19, 2012. Prior to the start of my review, I was provided with an alphabetical list of all active full-time city employees and elected/appointed officials, which I used to cross reference each individual training acknowledgement form. As of March 19, 2012, my review revealed that the City had 96 active full-time employees and elected/appointed officials.

- **Scope**

The scope included a review of all the City of Belle Glade full-time employees and elected/appointed officials, required to submit an Ethics Training Acknowledgement Form. All forms submitted to Human Resources were maintained in filing cabinets arranged by alphabetical order.

- **Assessment**

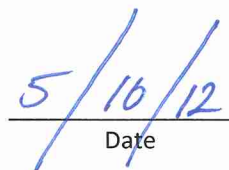
On March 19, 2012, a compliance review of the City of Belle Glade for ethics training was completed for all full-time city employees and elected/appointed officials. The overall assessment indicated that the City of Belle Glade had 96 active full-time employees and elected/appointed officials, all of which have been trained according to the reviewed records. As of this date, the City of Belle Glade is in compliance with the training requirement established by the Palm Beach County Code of Ethics.

- **Conclusion**

Based on the aforementioned facts the City of Belle Glade is in compliance with the ethics training requirement for all of its full-time employees and elected/appointed officials.

Submitted by:

  
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James A. Poag, Investigator  
PB County Commission on Ethics

  
\_\_\_\_\_  
Date

Reviewed by:

  
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(Initials)

  
\_\_\_\_\_  
Date